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BUENOS AIRES, ARGENTINA

HAROLD MORDKOFSKY
OF COUNSEL

EUGENE MALISZEWSKYJ ENGINEERING CONSULTANT

ARTHUR BLOOSTON 1914 – 1999 June 30, 2016

writer's contact information sta@bloostonlaw.com

202-828-5562

REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, DC 20554

RE:

Form 481 – Carrier Annual Reporting Data Collection, 2016

WC Dockets No. 14-58 and 10-90

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules, Haxtun Telephone Company (the "Company") hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,² the Company requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment for its Five Year Service Quality Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A

¹ 47 CFR §§54.313 and 54.422,

 $^{^2}$ In the Matter of Connect America Fund, et al., PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 16-296, released March 22, 2016..

letter in support of the Company's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, one redacted copy has been submitted via ECFS, and one confidential non-redacted copy has been submitted on paper via hand delivery to the Secretary's Office.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Salvatore Taillefer, Jr.

Counsel to

Haxtun Telephone Company

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WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com 202-828-5562

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

RE:

Form 481 – Carrier Annual Reporting Data Collection, 2016

WC Dockets No. 14-58 and 10-90

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Haxtun Telephone Company ("the Company"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, the Company requests confidential treatment of the Five Year Service Quality Improvement Plan and the outage reporting information (the "Confidential Information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, the Company states the following:

1. Identification of the specific information for which confidential treatment is sought.

The Company seeks confidential treatment of the Confidential Information, attachment 462190col112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about the Company as well as information about the Company's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019; and its outage information, Line 200, which contains competitively sensitive information.

2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.

The Confidential Information is being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the

Commission's rules.

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The Confidential Information is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors," and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.²

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The Confidential Information relates to voice and broadband services provided by the Company that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the Confidential Information is likely to result in substantial competitive harm to the Company because the Confidential Information could provide competitors with commercially sensitive insights related to the Company's operations, service offerings, and costs.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

The Company does not make the Confidential Information publically available in any way and further limits internal access to key employees subject to strict non-disclosure obligations.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The Company does not make the Confidential Information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

¹ Id. § 0.457(d)(2).

² 5 U.S.C. § 552(b)(4): 47 C.F,R. § 0.457(d).

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

The Confidential Information should be treated as confidential for an indefinite period, as the Company will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the Confidential Information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the Confidential Information, the Company requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

Salvatore Taillefer, Jr.

Counsel for

Haxtun Telephone Company

THE PERSON NAMED IN	REDACTED rm 481 - Carrier Annual Reporting Data Collection Form	EFOR PUBLIC INSPEC	TEQON 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	462190	
<015>	Study Area Name	HAXTUN TEL CO	-
<020>	Program Year	2017	
<030>	Contact Name: Person USAC should contact with questions about this data	Amanda Molina	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9042590029 ext.	
<039>	Contact Email Address: Email of the person identified in data line <030>	amolina@townes.net	
	Form Type	54.313 and 54.422	

LEGISTRA STATE	ervice Quality Improvement Reporting ollection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	462190	·-	
<015>	Study Area Name	EAXTUN TEL CO		
<020>	Program Year	2017		
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina		
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.		
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.ne	t	
<110>	If your answer to Line <110> is yes, do you have an existing \$54.202(a) "5	(yes / no	00	
<111>	year plan" filed with the FCC?	(yes / no)		
<112>	If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only required to address voice telephony service.		190co112.pdf	
	Please select the appropriate responses below (Yes, No, Not Applicable) to confit that the attached document(s), on line 112, contains a progress report on its five service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	-year	1	Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets		Yes	
<114>	Report how much universal service (USF) support was received		Yes	1
<115>		ve service quality	Yes	1
<116>	How much (USF) was used to improve service coverage and how support was used to imp		Yes	1
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity and how support was used to improve service.	-		1
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	-10 con 1100 oupuolity	Yes	

Data Col	vice Outage Re lection Form		e)						ANO SESSION SESSION	\$250 BERTHER BERTHARD BOOK STANFART	-0986/OMB Control N	16755313753312593322552945345376
<010>	Study Area Co	ode				462190						
<015>	Study Area Na					HAXTUN TEL	co					
<020>												
<030>												
<035>												
<039>	Contact Email	Address - Ema	il Address of pe	erson identified	in data line <0	30> amolina@tow	mes.net					
<210>	For the prior	r calendar yea	ar, were there	e any reportal	ble voice serv	ice outages?	Yes					
<220>	<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d>></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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						wo	rksheet					
	77777		7,7,7,1,1,1,1				-			***************************************		
				<u> </u>								

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	1	l	1	1		1	1		1		1	1

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No: 3060-0986/OMB Control No: 3060-0819 July 2013
<010> Study Area Code	462190
<015> Study Area Name	HAXITUM TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townss.net
<300> Unfulfilled service request (voice)	0
<310> Detail on attempts (voice)	
Nam	Name of Attached Document
<320> Unfulfilled service request (broadband)	
<330> Detail on attempts (broadband) N	Name of Attached Document

[[4UU] Number of Complaints, per 1,000 customers
The second state of the se

<010>	Study Area Code	62190	
<015>	Study Area Name	ARTUN TEL CO	
<020>	Program Year	91.7	
<030>	Contact Name - Person USAC should contact	regarding this data Amanda	Rolina
<035>	Contact Telephone Number - Number of per- <030>		9042590029 ext.
<039>	Contact Email Address - Email Address of per <030>	son identified in data line	amolicatownes.net
<400>	Select from the drop-down list to indicate hovoice complaints (zero or greater) for voice to calendar year for each service area in which yany facilities you own, operate, lease, or other	elephony service in the prior you are designated an ETC for	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	:e	0.0
<420>	Complaints per 1000 customers for mobile vo	oice	
<430>	Select from the drop-down list to indicate ho end-user customer complaints (zero or great the prior calendar year for each service area an ETC for any facilities you own, operate, lea	er) for broadband service in in which you are designated	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broad	adband	0.0
<450>	Complaints per 1000 customers for mobile br	roadband	

500) Con Data Colle	pliance With Servica Quality Standards and Consumer Protection Rules extion Form	FCC Furm 481. OMB Control No. 3060-0985/0MB Control No. 3060-0813 July 2013
<010>	Study Area Code	462190
<015>	Study Area Name	EASTUN TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net
<500>	Certify compliance with applicable service quality standards and consumer pro	tection rules Yes
		462190co510.pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Re	les Compliance

REDACTED - FOR PUBLIC INSPECTION
OMB Control No. 3069-0986/OMB Control No. 3069-0819
July 2013 (600) Functionality in Emergency Situations Data Collection Form

<010>	Study Area Code	462190
<015>	Study Area Name	HANTUM TEL CO
<020>	Program Year	20:7
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Holina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amplina@townes.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	462190co610.pdf
	·	

<703>

BANG MARKET PRO	rice Offerings including Voice Rate Data bliection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	462190
<015>	Study Area Name	HAXTUN TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data li	ne <030>
<039>	Contact Email Address - Email Address of person identified in data	ine <030> amolina@townes.net
<701> <702>	Residential Local Service Charge Effective Date Single State-wide Residential Local Service Charge	

<a1></a1>	<a2></a2>	<a3></a3>	<61>	<62>	 kb3>	<b4></b4>	<bs></bs> 655>	<c></c>
				Residential Local			Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
					-			
		_						
		,		C	4 1 1 4			
				See at	tached worksheet			
		_						
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Page 9

REDACTED -	FOR	PUBLIC	INSPECTION

Data Coll	erating Companies ection Form				FCC Form 481 DMB Control No. 3060-0986/0 July 2013	MB Control No. 3060-0819
<010>	Study Area Code .		462190			
<015>	Study Area Code					
<020>	Program Year		HAXTUN TEL CO 2017	2		
<030>		ISAC should contact regarding this data	Amanda Molina			
<035>		ber - Number of person identified in data line <030>	9042590029 ex			
<039>		Email Address of person identified in data line <030>	amolina@town	es.net		
<810>	Reporting Carrier	Haxtun Telephone Company				
<811>	Holding Company	Townes Telecommunications, Inc.				
<812>	Operating Company	Haxtun Telephone Company				
<813>		62 15		<525	<43>	
		Affiliates		SAC	Doing Business As Company or Brand D	esignation
1					AINI III.	
•						· · · · · · · · · · · · · · · · · · ·
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			See atta	ched worksho	et	
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•						
•						
•						
•						

	(900) Tribal Lands Reporting Data Collection Form DIVID 2013				
<010>	Study Area Code	462190			
<015>	Study Area Name	HAXTUN TEL CO			
<020>	Program Year	2017			
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina			
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext			
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net			
<900>	Does the filing entity offer tribal land services? (Y/N)	No			
<910>	Tribal Land(s) on which ETC Serves				
<920>	Tribal Government Engagement Obligation	Name of Attached Document			
If your c	company serves Tribal lands, please select (Yes, No, NA) for each these boxes				
to confi	rm the status described on the attached document(s), on line 920,	,			
demons	trates coordination with the Tribal government pursuant to	Select			
§ 54.313	B(a)(9) includes:	Yes or No or			
<921> <922>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions. Feasibility and sustainability planning;	Not Applicable			
<923>	Marketing services in a culturally sensitive manner;				
<924>	Compliance with Rights of way processes				
<925>	Compliance with Land Use permitting requirements				
<926>	Compliance with Facilities Siting rules				
<927>	Compliance with Environmental Review processes				
<928>	Compliance with Cultural Preservation review processes				
<929>	Compliance with Tribal Business and Licensing requirements.				
	1				

			1 400 2
	pice and Broadband Service Rate Comparability ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		462190
<015>	Study Area Name		HAXTUN TEL CO
<020>	Program Year		2017
<030>	Contact Name - Person USAC should contact regarding this data		Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <	030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <	<030>	amolina@townes.net
<1000> <1010>	Voice services rate comparability certification Attach detailed description for voice services rate comparability compliance	Yes	
			Name of Attached Document
<1020>	Broadband comparability certification		- Pricing is no more than the most recent applicable benchmark announced by Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance		

Name of Attached Document

# 73742190950B132223133138	o Terrestrial Backhaul Reporting ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	462190
<015>	Study Area Name	HAXTUN TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net
<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yeş
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	kbps

Lifeline	rms and Condition for Lifeline Gustomers ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		462190
<015>	Study Area Name		HAXTUN TEL CO
<020>	Program Year		2017
<030>	Contact Name - Person USAC should contact regarding this data		Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data li	ne <030>	
<039>	Contact Email Address - Email Address of person identified in data l	ine <030	> amolina@townes.net
- 100			462190col210.pdf
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		
			Name of Attached Document
<1220>	Link to Public Website	НТТР —	
or the we	neck these boxes below to confirm that the attached document(s), on line 1 bsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:	·	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	1	
<1222>	Details on the number of minutes provided as part of the plan,	\checkmark	
<1223>	Additional charges for toll calls, and rates for each such plan.		

Data Collect	Cap Carrier Additional Documentation on Form e-of-Return Carriers offiliated with Price, Cap Local Exchange Carriers		Ó	C Form 481 MB Control Ng. 3060-0985/OMB Control Ng. 3060-0819 y 2013
<010> St	udy Area Code	462190		
	udy Area Name	HAXTUN TEL CO		
	ogram Year	2017		
<030> Co	ntact Name - Person USAC should contact regarding this data	Amanda Molina		
	ontact Telephone Number - Number of person identified in data line <030>	9042590029 ext.		
	ntact Email Address - Email Address of person identified in data line <030>	amolina@townes.net		
Select the and Conn	appropriate responses below (Yes, No, Not Applicable) to note ect America Phase II support as set forth in 47 CFR § 54.313(b), cremental Connect America Phase I reporting	compliance as a recipient of Inc	remental High Cost support, High	Cost support to offset access charge reductions,
<2010>	2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note 2016 certification, this applies to Round 2 recipients c Support			
<2011>	3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note 2016 certification, this applies to Round 1 recipients of Support	·		
<2022>	Recipient certifies, representing year two after filing a acceptance of funding pursuant to 54.312(c), that the question are not receiving support under the Broadba Program or the Broadband Technology Opportunities projects that will provide broadband with speeds of a Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients on	locations in nd Initiatives Program for least 4		
<2023>	The attachment on line 2024 includes a statement of capital funding expended in the previous year in mee America Phase I deployment obligations, accompanie blocks indicating where funding was spent. This cove 54.313(b)(2)(ii). Round 2 recipients only.	ing Connect I by a list of census		
<2024A>	Round 2 Recipient of Incremental Support?			
<2024B>	Attach list of census blocks indicating where funding two - 54.313(b)(2)(ii). Round 2 recipients only.	•	e of Attached Document Listir iired Information	ng
<2025A>	Round 1 or Round 2 Recipient of Incremental Support	•		
<2025B>	Attach geocoded Information for Phase I milestone re year three and Round 2 for year two) - Connect Amer Docket 10-90, Report and Order, FCC 13-	,	e of Attached Document Listir iired Information	ng
<2015>	2016 and future Frozen Support Certification 47 CFR 6	54 313(c)(4)		

Data Collection For	rrier Additional Documentation (Continued) m storn Garriers affiliated with Price Cap Local Exchange Carriers		5: 3060-9985/OM8 Control No: 3050-0819
<2016>	Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification support used to build broadband America Phase II Reporting {47 CFR § 54.313(e)}		
<2017A>	Connect America Fund Phase II recipient?		
<2017B>	Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price	Name of Attached Document Listing Required Information	
<2018>	cap carrier used for capital expenditures in 2015. Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)	Name of Attached Document Listing Required Information	
<2019>	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)		
<2020>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)		
<2021>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)		
<2026>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)		
<2027>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)		

(2001) bota	Of Return Carrier Additional Documentation		OBLIGI		
Data Collect					FCC Form 481. OMB Control No. 3050-0986/OMB Control No. 3050-0819.
Place of the second sec				and the second s	July 2013
-01 D	Shudu Aran Coda				
<010>	Study Area Code Study Area Name		462190		
<020>	Program Year		HAXTUN 2017	TEL CO	
<030>	Contact Name - Person USAC should contact regarding this	data		M-73	_
<035>	Contact Telephone Number - Number of person identified in		Amanda		
			90425900 amolina	@townes.	net:
<039>	Contact Email Address - Email Address of person Identified i	n data ine <030>	amorria		
complian	the items below to note compliance with five year be with the financial reporting requirements set fort ments attached below is accurate.				
	Progress Report on 5 Year Plan				
(3009)	Carrier certifies to 54.313(f)(1)(iii)				
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}		Yes - At	tach Certific	
		N **** *			462190co3010.pdf
(3010B)	Please Provide Attachment	Name of Attach Information	ed Document Li	sting Required	
(3012A)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	No - No New Con	munity Anchor	3	
(3012B)	Please Provide Attachment		ed Document Li	sting Required	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR	Information (Yes/No)	\odot	0	
(3014)	§ 54.313(f)(2)} If yes, does your company file the RUS annual report	(Yes/No)	0	\odot	
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)				
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows				
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required	Name of Attach Information	ed Document Lis	sting Required	
(3018)	documentation if the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313{f}(2), contains:	(Yes/N	io) 💿	0	
(3019)	Either a copy of their audited financial statement; or			1	
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers Document(s) for Balance Sheet, Income Statement			_	
	and Statement of Cash Flows			•	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			/	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for				
(3023)	Telecommunications Borrowers Underlying information subjected to a review by an independent certified public accountant				
(3024)	Underlying information subjected to an officer certification.				
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows				
(3026)	Attach the worksheet listing required information	Name of Attach	ed Document Lis	sting Required	462190co3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCCForm 481
Data Collection Form	OMB Control No. 3060-0985/DMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	462190
<015>	Study Area Name	HAXTUN TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net
DITTERTOR	The state of the s	The state of the s

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

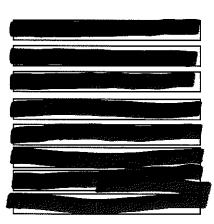
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



Page 19

(CF-198)
(4005) Rural Broadband Experiment Additional Documentation FCC Form 481
3700713181.771939111.771931111.7719311111.771931111111111
Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3060-0819
Uata Collection Form Control No. 3080-0819
Dis 7813
July 2013

<010>	Study Area Code	462190
<015>	Study Area Name	EAXTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Kolins
<035>	Contact Telephone Number - Number of person identified in data li	ne <030> 9042590029 ext.
<039>	Contact Email Address - Email Address of person Identified in data is	ne <030> amolina@townes.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations - FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to	Name of Attached Document Listing Required Information		
broadband service in the preceding calendar year.			
Broadband Deployment Locations – FCC 14-98 (para	ograph 80)		
4004a. Attach a list of geocoded locations to which broadband has been deployed as of the			
June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information		
4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials			
must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information		

Certificat Data Coll	ion - Reporting Carrier ection Form	FCCForm 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	462190
<015>	Study Area Name	HAXTUN TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

certify that I am an officer of the reporting carrier; my respo recipients; and, to the best of my knowledge, the Information	_ ·	
Name of Reporting Carrier: HAXTUN TEL CO	-	
Signature of Authorized Officer: CERTIFIED ONLINE		Date 06/22/2016
Printed name of Authorized Officer: Amanda Molina		
fitle or position of Authorized Officer: Vice President of	External Relations	
Telephone number of Authorized Officer: 9042590029 ext.		
Study Area Code of Reporting Carrier: 462190	Filing Due Date for this form:	07/01/2016

Certifical Data Coll	ion = Agent / Carrier. ection Form	FCC Form 481 OMB Control No.: 3060-0986/OMB Control No.: 3060-0819 July 2013
<010>	Study Area Code	462190
<015>	Study Area Name	HAXTUN TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person Identified in data line <030>	amolina@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to A	uthorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
	is authorized to submit the information reported on behalf of the reporting carrier. I my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized and data provided to the authorized agent is accurate.
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form	can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

uthorized to File Annual Reports for CAF or LI Recipient	ts on Behalf of Reporting Carrier
ized to submit the annual reports for universal service support re porting carrier; and, to the best of my knowledge, the information	
	Date:
nt;	
Filing Due Date for this form:	
- i	ized to submit the annual reports for universal service support re porting carrier; and, to the best of my knowledge, the informatio

Attachments

LINE 112: PROGRESS REPORT UPDATE REDACTED IN ENTIRETY

LINE 200: SERVICE OUTAGE REPORTING (VOICE) REDACTED IN ENTIRETY

Carrier Name:

Haxtun Telephone Company

Carrier SPIN:

143002491 462190

Carrier SAC:
Operating State:

Colorado **

Line 510:

Service Quality Standards and Consumer Protection Rules Compliance for

voice and broadband services

Haxtun Telephone Company ("Haxtun" or "the Company") complies with the following rules in the Code of Colorado Regulations:

4 CCR 723-2330 - 2341

Relating to Quality of Services Provided to the Public

4 CCR 723-2360 - 2399

Relating to Collection and Disclosure of Personal Information

Haxtun complies with the following federal consumer protection rules and regulations:

FCC 47 C.F.R. §§64.2001-64.2011 – Customer Proprietary Network Information ("CPNI") FTC 16 C.F.R. §681.2 – Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transactions Act of 2003

All customer protection and disclosures established by the Fair Credit Reporting Act (15 U.S.C. §§1681, et seq.) and the Truth in Lending Act (15 U.S.C. §§1601, et seq.)

The Company has a CPNI Policy Manual detailing and enforcing the requirements of the federal CPNI rules. Each year, the CPNI Compliance Officer (1) communicates with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervises the training of Company employees and agents who use or have access to CPNI; (3) supervises the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintains records regarding the use of CPNI in marketing campaigns; and (5) receives, reviews and resolves questions or issues regarding use, disclosure, distribution or provision of access to CPNI. The CPNI Compliance Officer certifies compliance annually with the FCC by March 1.

The Company has an Identity Theft Prevention Program ("the Program")-that was-approved by the Board of Directors in September 2008. The Board appointed Red Flag Coordinator is responsible for updating the Program as necessary; the day-today supervision of the Program; training Company employees regarding their responsibilities with respect to the Program; and responding to employee questions and concerns regarding identity theft or the Program. The Red Flag Coordinator is required to annually prepare an Identity Theft Prevention Program Compliance Report for the Board's approval by October 1. The Identity Theft Prevention Program Compliance Report evaluates the effectiveness of the Program; the nature and extent of the Company's service provider arrangements and their impact on the effectiveness of the Program; reports any significant incidents involving identity theft and the Company's response to such incidents; and provides recommendations to the Board for periodic reviews of the Program and the adoption of material changes and other revisions, modifications and updates to the Program.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Carrier Name:

Haxtun Telephone Company

Carrier SPIN:

143002491

Carrier SAC:
Operating State:

462190 Colorado

Line 610:

Functionality in Emergency Situations for voice and broadband services

Haxtun Telephone Company ("Haxtun" or "the Company") has an Emergency Operations Plan ("EOP" or "the Plan") that addresses the requirements for continuity of service and systematic restoration of service after loss of service due to an emergency. The EOP is administered and maintained by a member of senior management of the parent company, Townes Telecommunications, Inc., and is reviewed annually to ensure that each applicable section is accurate and any changes or updates to the Plan are made on a timely basis.

An Emergency Director has been authorized to implement the provisions of the EOP. The Emergency Director conducts training with employees and is responsible for ensuring that all new employees are provided a 30 minute overview of the Plan as part of their orientation. Specific supervisory personnel receive additional intense instructions regarding special areas of the Plan.

The Plan established an Emergency Committee made up of senior management and key company personnel, who upon notification by the Emergency Director that a potential emergency exists, convene to declare an emergency, notify affected parties and assume control of restoration of service efforts.

An emergency control center is established at the Company's business office, which is equipped with a back-up power generator and a wireless telephone set. Depending upon the severity and type of emergency and the safety of the emergency location, a control center may be established at the site of the event.

In case of power outages, batteries in the central office will last on average 8 hours depending on how many lines (AMP load) are served at that particular location. The stand-by generator has 24 hour diesel capacity and small generators are available to be put on smaller concentrators if power is lost. The small generators have to be refueled every few hours.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

Data Coll	ection form				DMB Control No. 306 July 2013	0-0986/QMB G6-trol N	lo. 3060-0819
<010>	Study Area Code		462190				
<015>	Study Area Name		HAXTUN TEL CO				
<020>	Program Year		2017				
<030>	Contact Name - Person USAC should contact regarding this data		Amanda Molina				
<035>	Contact Telephone Number - Number of person identified in data	a line <030>	9042590029 ext.	 			
<039>	Contact Email Address - Email Address of person identified in dat	a line <030>	amolina@townes.net				
							-
<701>	Residential Local Service Charge Effective Date	1/1/2016					
<702>	Single State-wide Residential Local Service Charge						

FCCForm 481

REDACTED - FOR PUBLIC INSPECTION

<703>

(700) Price Offerings including Voice Rate Data

<a1>></a1>	< 92>	<a3> </a3>	85.5	<b2></b2>	< <u>683</u> ≥	 5045	<bs></bs> 55>	će.
		l		Residential Local			Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge		Service Charge	Total per line Rates and Fees
со	Crook		FR	16.0	0.0	0.416	0.0	16.42
co	Fleming		FR	16.0	0.0	0.416	0.0	16.42
co	Haxtun		FR	16.0	0.0	0.415	0.0	16.42
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			1					

(710) Broadband Price Offerings Data Collection Form		FCC Form 481 OMB Control No. 3050-0986/OMB Control No. 3050- July 2013	0819
<010> Study Area Code	462190		

<010>	Study Area Code	462190
<015>	Study Area Name	HAXTUN TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9042590029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

<039>	Contact Email Address	- Email Address of person	dentified in data line <u3u></u3u>	amolina@townes.ne

<711>

(ais	<a2></a2>	<01×	<62>	<d><d1><</d1></d>	≼62	⟨dΒ⟩		<04≥
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
co	All	39.0	0.0	39.0	0.768	0.256	999999.0	Other, No Usage Limitations
co	A11	54.0	0.0	54.0	2.0	0.768	999999.0	Other, No Usage Limitations
co	A11	35.99	0.0	35.99	2.0	0.768	999999.0	Other, No Usage Limitations
co	All	41.99	0.0	41.99	6.0	1.0	999999.0	Other, No Usage Limitations
co	A11	62.99	0.0	62.99	6.0	1.0	999999.0	Other, No Usage Limitations
co	All	104.99	0.0	104.99	10.0	1.0	999999.0	Other, No Usage Limitations
CO	All	48.99	0.0	48.99	12.0	1,0	999999.0	Other, No Usage Limitations
со	All	58.99	0.0	58.99	15.0	1.0	999999.0	Other, No Usage Limitations
co	All	74.99	0.0	74.99	25.0	1.0	999999.0	Other, No Usage Limitations
co	All	90.0	0.0	90.0	4.0	1.0	999999.0	Other, No Usage Limitations
	***************************************	<u> </u>			<u> </u>			

ASHUMBHHUU!!	rrating Companies ection Form			FCC Form 481 DMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	462190		
<015>	Study Area Name	HAXTUN TEL C		
<020>	Program Year	2017		
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molin	a	,
<035>	Contact Telephone Number - Number of person identified in data line <030	> 9042590029 e	xt.	
<039>	Contact Email Address - Email Address of person identified in data line <030	> amolina@town	es.net	
<810>	Reporting Carrier Haxtun Telephone Company			
<811>	Holding Company Townes Telecommunications, Inc.			
<812>	Operating Company Haxtun Telephone Company			
<813>	ζ ε1≻ Affiliates		<825 5AC	<a3> Doing Business As Company or Brand Designation</a3>
z	Choctaw Telephone Company			N/A
_	Electra Telephone Company		421893	N/A
-	Haxtun Telephone Company		442069 462190	N/A N/A
	Maximum Telephone Company		462190	N/A
-	MoKan Dial Inc - Kansas		411807	N/Δ
-	MoKan Dial, Inc Kansas		411807	N/A N/A
- - -	MoKan Dial, Inc Missouri		421807	N/A
- - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company	npany	421807 210335	N/A NEFCOM
- - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com	npany	421807	N/A NEFCOM N/A
- 	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company	npany	421807 210335 170200	N/A NEFCOM
- - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A
- - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A
- - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A
- - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc. NEFCOM Long Distance, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A N/A N/A N/A NEFCOM Communications, Inc.
- - - - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc. NEFCOM Long Distance, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A N/A N/A N/A NEFCOM Communications, Inc.
- - - - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc. NEFCOM Long Distance, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A N/A N/A NEFCOM Communications, Inc.
- - - - - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc. NEFCOM Long Distance, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A N/A N/A NEFCOM Communications, Inc.
- - - - - - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc. NEFCOM Long Distance, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A N/A N/A NEFCOM Communications, Inc.
- - - - - - - - - - - - - - - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc. NEFCOM Long Distance, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A N/A N/A NEFCOM Communications, Inc.
- - - - - - - - - - - - - - - - - - -	MoKan Dial, Inc Missouri Northeast Florida Telephone Company Pymatuning Independent Telephone Com Tatum Telephone Company Walnut Hill Telephone Company MoKan Communications, Inc. NEFCOM Long Distance, Inc.	npany	421807 210335 170200 442150	N/A NEFCOM N/A N/A N/A N/A N/A N/A NEFCOM Communications, Inc.

Carrier Name:

Haxtun Telephone Company

Carrier SPIN:

143002491

Carrier SAC: Operating State:

462190 Colorado

Line 1210:

Terms and Conditions for Lifeline Program Customers

Haxtun Telephone Company ("Haxtun" or "the Company") complies with the FCC CFR 47 §§54.4, Universal Service Support for Low-Income Customers. The Company has developed a Lifeline Program Policy & Procedures Manual, which incorporates the federal Low-Income Program requirements. Lifeline is a non-transferable retail service offering for which qualifying low-income consumers receive a \$9.25 federal discount on flat rated basic local telephone service, whether it is purchased on a stand-alone basis or as part of a bundled service that includes voice and data services and optional calling features. Lifeline customers are charged a separate charge for toll calls, but are provided Toll Blocking free of charge if they elect to subscribe to the service. The Lifeline supported services are as shown below:

	Inside Base	Outside Base	
	Rate Area	Rate Area	
Residence Access Line	16.00	16.00	
Federal SLC	6.50	6.50	
Total Monthly Rate	22.50	22.50	
Lifeline Discounts to Total Monthly Rate:			
Literate Discounts to Total Monthly Rate.			
Federal Flat Rate Lifeline Support	(9.25)	(9.25)	FCC 497: Lifeline Worksheet
Total Lifeline Service Monthly Rate	(9.25)	(9.25)	
Net Monthly Local Service for Lifeline Customer	13.25	13.25	

Additional Services:

Toll Blocking is free to Lifeline customers who subscribe to this service.

The company is required to include the Lifeline Service Program in their Local Exchange Tariff. The rates for basic local residential service are also contained in the Local Exchange Tariff and the rates for the federal SLC are included in the NECA Tariff No. 5. Changes to any of these rates must be approved by the appropriate regulatory agency.

Carrier Name:

Haxtun Telephone Company

Carrier SPIN:

143002491

Carrier SAC: Operating State:

462190 Colorado

Line 3010:

Milestone Certification

Haxtun Telephone Company ("Haxtun" or "the Company"), pursuant to, and in accordance with, F.C.C. 47 C.F.R § 54.202(a) and § 54.313(f)(1)(i), hereby submits this letter of certification that the Company is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10Mbps downstream/1Mbsp upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

LINE 3026: FINANCIAL STATEMENTS

REDACTED IN ENTIRETY